

**REMARKS**

Claims 1-3 and 7-9 and 17 are pending. Claims 4-6 and 10-16 have been canceled.

Claim 17 is new. The applicant respectfully requests reconsideration and allowance of this application in view of the above amendments and the following remarks.

Claims 1-3, 7 and 9 were rejected under 35 USC 102(b) as being anticipated by the published Japanese application to Kumano. The applicants respectfully request that this rejection be withdrawn for the following reasons.

The office action reflects a misunderstanding of the Kumano reference. This misunderstanding occurred in the parent case as well. In an interview held on 21 October 2004 for the parent application, the undersigned argued that the mold retainer 18, 21 are mold members. That is, the mold retainers 18, 21 are in place only during the molding of the semiconductor device; they are not permanent. The mold retainers 18, 21 are removed during the manufacturing process. Note that the English abstract of Kumano states that "the mold retainers 18, 21 are exfoliated and cut-separated for every element." "Exfoliated" means removed.

Further, the planar electrodes 13, 14 of Kumano cannot function unless they are attached to another device such as a printed circuit board. The mold members 18, 21 must be removed for

the device to function. Figure 7 of Kumano shows the device with the mold members removed.

Therefore, the mold retainers cannot be considered to correspond to the claimed insulating sheets.

No interview summary form was received for the interview of 21 October 2004 in the parent application; however, the interview is referred to in the Letter of 21 October 2004.

In the parent application, the examiner apparently agreed with the applicants on this point. The parent application was allowed and was ready to issue when the applicants filed an RCE to have additional references considered. Therefore, the applicants were surprised by the rejection in the present application in which the mold members 18, 21 were again construed as insulating sheets.

Claim 1 has been clarified to recite that the insulating sheet is dielectric and that the insulating sheet is secured to the heat conducting plate. The Kumano reference fails to disclose these features. Therefore, the applicants respectfully request that this rejection be withdrawn.

Claims 2, 3, 7, and 9 depend on claim 1, directly or indirectly. Therefore, claims 2, 3, 7, and 9 are considered to be in condition for allowance for the reasons given with respect to claim 1. In addition, claim 3 recites that the insulating sheet is made of silicon rubber. This feature is not disclosed by Kumano.


Claim 8 was rejected under 35 USC 103(a) as being unpatentable over the published Japanese application to Kumano in view of Eguchi *et al.* Claim 8 depends indirectly on claim 1 and is thus considered to be patentable for the reasons given for the patentability of claim 1.

Claim 17 is new. Claim 17 depends on claim 1 and is thus considered to be in condition for allowance at least for the reasons given with respect to claim 1.

In view of the foregoing, the applicant respectfully submits that this application is in condition for allowance. A timely notice to that effect is respectfully requested. If questions relating to patentability remain, the examiner is invited to contact the undersigned by telephone.

Please charge any unforeseen fees that may be due to Deposit Account No. 50-1147.

Respectfully submitted,

  
James E. Barlow  
Reg. No. 32,377

Posz Law Group, PLC  
11250 Roger Bacon Drive, Suite 10  
Reston, VA 20190  
Phone 703-707-9110  
Fax 703-707-9112  
Customer No. 23400